

LA

Jason M. Ludke

09724-089

Fci- Terre Haute

P.O. Box 33

Terre Haute, IN

47808

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2020 JUN 15 P 1:39

CLERK OF COURT

Re: United States of America

v.

Jason M. Ludke

aka: Muhammad Abdun Naasir

Case No. 16-CR-175

Dear Hon. U.S. Dist. Judge L. Adelman:

I am writing to bring to the courts attention; that throughout my case, my trial attorneys never alerted me that as a result of a Guilty Plea; I would then face "Immigration Debarment" proceedings under:

- 2 C.F.R. pt. 180
- 2 C.F.R. pt. 3000
- 48 U.S.C. pt. 9

I have received a "Immigration Notice of Debarment dated 5-13-2020."

"

Immigration Case No.

ICE-2019-0920-0605 "

I was never told by my trial attorneys that I would be punished with punitive measures of this nature by Immigration and Customs Enforcement, as a result of this criminal conviction.

Thus, I request this Plea be withdrawn, due to its unknowingly, unvoluntarily, and unwillingly entered into.

I was never made aware of these "extra" punitive-disciplinary measures to be made against my person.

I feel that this matter violates my rights to Liberty under the Due process Clause; and is a violation of my Constitutional rights under the 5th, and 14th Amendment U.S. Const.

I further believe that this issue is violating my rights under the Ex Post Facto Clause; subjecting me to these illegal punishments after I am already punished in this unjust criminal conviction.

Thus, I request the Honorable Court to Order that I Not be subjected to this "Debarment" action; or enter order, reversing Naasir's sentence and Guilty Plea in this action due to this "Ex Post Facto violation" and Naasir's constitutional rights being circumvented on this issue.

I declare under the penalty of perjury that everything stated herein is true and correct to the best of my knowledge and beliefs,

Executed at Terre Haute, Indiana
this 25th day of May, 2020.

Respectfully submitted:

Muhammad Naasir
(Jason Ludke)

Jason M. Ludke
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FCI - Terre Haute
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CC: I file ✓
U.S. Dist. Judge L. Adelman
Michael Buckingham - U.S. Immigration Director - Washington, D.C.
Coalition Civil Freedoms - Washington, D.C.,
Constitutional Law Center, Muslim America - Richardson, TX
Attorney Joshua Miller